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24 AMERICAN HOME ASSURANCE COMPANY

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

QT MANAGEMENT; AND IDB GROUP
USA INVESTMENTS;

Plaintiffs,

v.

AMERICAN HOME ASSURANCE
COMPANY; and DOES 1 THROUGH 20,
INCLUSIVE,

Respondents.

Case No. 2:18-cv-00832-APG-GWF

**STIPULATION AND ORDER TO
EXTEND TIME FOR RESPONDENT
AMERICAN HOME ASSURANCE
COMPANY TO FILE AN OPPOSITION
TO PLAINTIFFS' MOTION TO STAY
ARBITRAL PROCEEDINGS
(First Request)**

1 **STIPULATION FOR EXTENSION OF TIME TO FILE OPPOSITION**

2 Plaintiffs QT Management and IDB Group USA Investments (collectively,
3 “Plaintiffs”) and Respondents American Home Assurance Company (“American Home”
4 and together with Plaintiffs the “Parties”), by and through their counsel, respectfully
5 submit the following Stipulation to allow American Home until on or before June 22,
6 2018 to file an opposition to Plaintiffs’ Motion for Stay of Arbitration filed on May 24,
7 2018. Plaintiffs shall reply to American Home’s response within seven days after
8 service of the response.

9 1. On May 24, 2018, Plaintiffs filed a Motion for Stay of Arbitration (ECF
10 No. 8) and served a copy thereof on American Home.

11 2. American Home’s deadline to oppose Plaintiffs’ Motion for Stay of
12 Arbitration is June 7, 2018.

13 3. This is the first stipulation for extension of time to file an Opposition to
14 Plaintiffs’ Motion for Stay of Arbitration.

15 4. Good cause for the stipulation exists. The Parties have entered into so-
16 ordered stipulations providing for reciprocal extensions of time in multiple related
17 actions currently pending in Nevada and New York for similar motions to allow for
18 consistency in their arguments. The Parties respectfully request the extension in this

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1 action in order to ensure that the Court receive a full an accurate briefing of the motion
2 before it.

3 IT IS SO STIPULATED.

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5 DATED this 7th day of June, 2018

DATED this 7th day of June, 2018

6
7 MORALES FIERRO & REEVES

HELM & ASSOCIATES

8
9 /s/ Marc J. Derewetzky

/s/ Kevin E. Helm

10 Marc J. Derewetzky (NBN: 6619)

Kevin E. Helm (NBN: 3432)

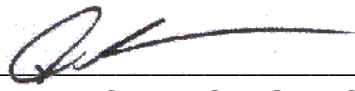
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14 Attorneys for Plaintiffs
15 QT Management and IDB Group USA
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18 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE/
21 Dated: June 11, 2018.